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11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

14 **IN RE: CATHODE RAY TUBE (CRT)**
15 **ANTITRUST LITIGATION**

Case No. 3:07-cv-5944
MDL No. 1917

16 **CLASS ACTION**

17 This Document Relates to:
18 All Indirect Purchaser Actions

**AFFIDAVIT OF ROBERT J. BONSIGNORE
IN SUPPORT OF OBJECTION TO SPECIAL
MASTER'S REPORT AND
RECOMMENDATION ON FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT AND AWARD OF
ATTORNEYS' FEES AND OTHER
EXPENSES AND AWARDS AND REQUEST
FOR DE NOVO ORDER**

Judge: Honorable
Courtroom One, 17th Floor

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28 **AFFIDAVIT OF ROBERT J. BONSIGNORE IN SUPPORT OF OBJECTION TO SPECIAL MASTER'S REPORT
AND RECOMMENDATION OF FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND AWARD OF
ATTORNEYS' FEES AND OTHER EXPENSES AND AWARDS AND REQUEST FOR DE NOVO ORDER**

Case No. 3:07-cv-5944, MDL No. 1917

1 I, Robert J. Bonsignore, declare as follows:

2 1. I am an attorney licensed to practice before the courts of New Hampshire and
3 Massachusetts, as well as federal courts throughout the country. I am a partner in the law firm
4 BONSIGNORE TRIAL LAWYERS, PLLC and have personal knowledge of the facts stated in
5 this declaration and, if called as a witness, I could and would testify competently to them. I make
6 this declaration in support of my firm's Objection to Special Master's Report and
7 Recommendation on Final Approval of Class Action Settlement and Award of Attorneys' Fees and
8 Other Expenses and Awards and Request for De Novo Order.

9 2. Except as to those matters stated upon information and belief or that are
10 otherwise obvious in context or by choice of words, I have personal knowledge of the facts
11 contained herein. As to those matters stated on information and belief, I believe them to be true
12 and accurate.

13 3. The opinions that I offer are made to a reasonable degree of professional certainty
14 and based upon my training, education and experience, my review of all related records,
15 including exchanges with Lead Counsel, the pleadings placed on file in MDL 1917, emails
16 exchanged, my own personal experiences in MDL 1917, my historic personal experience as an
17 active member of the national Plaintiff's Anti Trust and consumer protection bars, my
18 involvement in other nationally coordinated litigation as Plaintiff's counsel, my discussions and
19 experiences with dozens of Plaintiff's counsel nationwide and more generally, the firms and
20 many absent class members involved here.

21 4. As clearly stated during hearing and supported by contemporaneously created
22 emails that were kept in the ordinary course of business Lead Counsel Alioto made a number of
23 false and misleading assertions concerning facts critical to this Court's De Novo review. I do not
24 believe any of his related assertions, even if assumed to be true, would tend to make the existence
25 of any fact of consequence to the determination of the matters of law brought before the Court by
26 the excluded Plaintiffs more probable, however if not addressed they may be accepted as true.

27 5. I am, therefore, in an abundance of caution offering this declaration pursuant to

1 FRE 401 in further response.

2 6. There are changes in the emails and fee agreement we previously submitted and
3 those attached here. Previously I instructed my staff to redact segments of the retention
4 Agreement and related email chain that we believe are privileged by virtue of attorney and client
5 communication. To eliminate a concern of the Special Master's, I have instructed my staff to
6 instead "black out" the attorney/client privileged communication sections with a black marker and
7 keep the documents length intact. The submissions are identical except for that distinction. We
8 remain willing to submit the complete copy of the fee agreement *in camera* upon request.

9 7. My firm is counsel of record in this case, and represents named plaintiff(s) Gloria
10 Comeaux, Jeff Speaect, Rosemary Ciccone, Anthony Gianasca, Mina Ashkannejhad individually
11 and/or as Administrator of the Estate of the Late R. Deryl Edwards, Jr., and Jeff Craig. Each of the
12 documents attached to this declaration are kept in the ordinary course of business:

13 8. Attachment 1 – Hilsee Group Website;

14 9. Attachment 2 –Federal Judicial Center Judge’s Class Action Notice and Claims
15 Process Checklist and Plain Language Guide;

16 10. Attachment 3 – Rust Report of Erroneous Notice and Claims Reporting;

17 11. Attachment 4- Anthony Gianasca’s Retention Agreement with Redactions;

18 1. Attachment 5 – Declaration of Josh Mansfield Re: Archive Emails pulled records
19 pursuant to the request of Mr. Bonsignore:

20 a. Exhibit 1 – Email from Ms. Carolyn Jorgenson dated March 2, 2012 relating to
21 CRT TV Model;

22 b. Exhibit 2 – Email from Robert Bonsignore to MDL 1917 Lead Counsel Mario
23 Alioto dated March 1, 2012 advising him he was missing Class Representatives including New
24 Hampshire;

25 c. Exhibit 3 – Email to Ms. Carolyn Jorgenson from Robert Bonsignore copying MDL
26 1917 Lead Counsel Mario Alioto dated March 5, 2012.

27 d. Exhibit 4 – Email from Ms. Carolyn Jorgenson dated March 6, 2012 with attached

1 Fee Agreement; and

2 e. Exhibit 5 – Email from Robert Bonsignore to MDL 1917 Lead Mario Alioto dated
3 March 6, 2012 with attached first Putative Missouri Class Representative David Perriman’s name,
4 address and phone; David Perriman’s CRT TV purchase history and photographs of multiple
5 Perriman TV’s and TV identification numbers; a first draft Confirmation of Purchase Affidavit;
6 and finally – Perriman’s local counsels contact information.

7 12. Attachment 6 – Emails between Lead Counsel Alioto and myself dated March 1,
8 2012 red – flagging Repealer states including New Hampshire appear to be missing;

9 13. Attachment 7 – Email to Lead Counsel Alioto dated November 9, 2015 and photos
10 of a Gianasca television

11 14. Attachment 8- Transcript of January 5, 2016 Hearing; and

12 15. Attachment 9 – Selections from Anthony Gianasca’s Deposition Transcript.

13 16. Attachment 10 - Bonsignore, PLLC Curriculum Vitae.

14 I declare under penalty of perjury that the foregoing is true and correct. Executed this 12th
15 day of February 2016, in Las Vegas, Nevada.

17 /s/ Robert J. Bonsignore
18 Robert J. Bonsignore, Esq.

CERTIFICATE OF SERVICE

I, Robert J. Bonsignore, hereby certify that on this 26th day of February, 2016, I caused the foregoing to be electronically filed with the Clerk of the Court by using the Case Management/Electronic Case Filing (CM/ECF) system, which will send a notice of electronic filing to all parties registered with the CM/ECF system in the above-captioned matter. A copy will be forwarded via first class mail, postage prepaid, to those parties not electronically registered.

/s/ Robert J. Bonsignore

Robert J. Bonsignore